

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: Connie and Albert Balderson)
)
) Case No. 16-31532-KRH
)
)
) Chapter 7
Debtor(s))
Address 2302 Coan Stage Rd.)
Heathsville, VA 22473)
Last four digits of SSN(s): 7806 & 8203)
)
)
)
)

**NOTICE OF MOTION TO EXPEDITE HEARING and
NOTICE OF MOTION TO Extend Time to File Reaffirmation
Agreement and Statement in Support of Reaffirmation Agreement**

Connie and Albert Balderson have filed papers with the court to Expedite Hearing and to Extend Time to File Reaffirmation Agreement and Statement in Support of Reaffirmation Agreement.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion (or objection), or if you want the court to consider your views on the motion (or objection), then on or before 7/13/2016, you or your attorney must:

X File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

America Law Group, Inc.
8501 Mayland Dr. Ste 106
Henrico, VA 23294

- ☐ Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**
- X** Attend the hearing on the motion scheduled to be held July 13, 2016 at 12:00 p.m. at United States Bankruptcy Court, 701 East Broad Street, Crtrm 5000 Richmond, VA 23219.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: 7/11/2016

Signature, name, address, and telephone
number of person giving notice:

/s/ Richard J. Oulton

Richard J. Oulton, Esq.
America Law Group, Inc.
8501 Mayland Dr., Ste 106
Henrico, VA 23294
Virginia State Bar No. 29640
Counsel for Albert & Connie Balderson

Certificate of Service

I hereby certify that I have this 11th day of July, 2016, mailed or hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to the parties listed on the attached service list.

/s/ Richard J. Oulton

Richard J. Oulton, Esq.

Creditors

American Adjustment Bu
re: NW CT Emergency Med PC
73 Field St
Waterbury, CT 06702-0000

American Adjustment Bu
re: NW CT Emergency Med

73 Field St.
Waterbury, CT 06702-0000

American Adjustment Bu
re: Nagatuck Valley Rad Assoc
73 Field St.
Waterbury, CT 06702-0000

Balanced Healthcare Receivable
141 Burke Street
Nashua, NH 03060-0000

Caine & Weiner
PO Box 5010
Woodland Hills, CA 91365-0000

Calvary Portfolio Services
Attn: Bankruptcy Dept
500 Summit Lake Dr.
Valhalla, NY 10595-0000

Capital One, N.a.
Capital One Bank (USA) N.A.
PO Box 30285
Salt Lake City, UT 84130-0000

Cavalry Portfolio Services
500 Summit Lake Drive, Ste 400
Valhalla, NY 10595-1340

Cavalry Portfolio Services, In
PO Box 1017
Hawthorne, NY 10532-0000

Cavalry SPV I, LLC
500 Summit Lake Drive, Ste 400
Valhalla, NY 10595

Century Financial Services, In
23 Maiden Lane
North Haven, CT 06473-0000

Comcast
5401 Staples Mill Road
Henrico, VA 23228-5421

Commonwealth Radiology, PC
1508 Willow lawn Drive
Suite 117
Richmond, VA 23230-0000

Connecticut Dept of Revenue Services
25 Sigourney Street
Bankruptcy Unit
Hartford, CT 06106

Connecticut Light & Power
PO Box 2899
Hartford, CT 06101-0000

Continental Emergency Services
PO Box 1617
Mechanicsville, VA 23116-0000

Convergent Outsourcing Inc
800 SW 39th St

PO Box 9004
Renton, WA 98057-0000

Cr Info Bur Collection
70 Jefferson Blvd Fl 4
Warwick, RI 02888-0000

Credit Center Inc
7 Finance Dr
re: Branford Fire Dept
Danbury, CT 06810-0000

Credit Protection Association
PO Box 802068
Dallas, TX 75380-0000

Endocrine Assoc of CT
200 Orchard Street #207
New Haven, CT 06511-0000

ERSolutions
800 SW 39th Street
PO Box 9004
Renton, WA 98057-0000

Ford Cred
Ford Credit
PO Box 6275
Deerborn, MI 48121-0000

Ford Motor Credit Company LLC
P. O. Box 62180
Colorado Springs, CO 80962

Horizon Financial Management
8585 S. Broadway
Ste. 880
Merrillville, IN 46401-5661

HSBC Bank
PO Box 5253
Carol Stream, IL 60197-0000

Hsbc/ Orchard Bank
Attn: Bankruptcy
PO Box 80084
Salinas, CA 93912-0000

Internal Revenue Service
PO Box 30396
Mail stop 822
Memphis, TN 38130-0000

IRS
P.O. Box 7346
Philadelphia, PA 19101

King William Medical Center

4917 Richmond Tappahannock Hwy
Suite 1
Aylett, VA 23009-0000

Lab Corp
PO Box 2240
Burlington, NC 27216-0000

LCA Collections
PO Box 2240
Burlington, NC 27216-0000

Memorial Regional Medical Cent
8260 Atlee Road
Mechanicsville, VA 23116-0000

Merc Adj Bur
PO Box 9016
Williamsville, NY 14231-0000

Nelson, Watson & Associates LLC
80 Merrimack St Lower Level
Haverhill, MA 01830-0000

OrthoVirginia
PO Box 35725
Richmond, VA 23235-0000

Pagliari, Inc.
re: Joseph Quaranta, MD
392 River Road
Shelton, CT 06484-0000

Patient First
PO Box 758941
Baltimore, MD 21275-0000

Peninsula Radiological Assoc
PO Box 12087
Newport News, VA 23612-2087

Pmab Srvc
5970 Fairview Rd Ste 800
Charlotte, NC 28210-0000

Primecare Family Care, PC
PO Box 845
Fredericksburg, VA 22404-0000

Progressive Direct Ins
6300 Wilson Mills Rd
Cleveland, OH 44143-0000

Quest Diagnostics
1901 Sulphur Spring Rd
Halethorpe, MD 21227-0000

Receivable Management

PO Box 17305
Richmond, VA 23226-0000

Receivable Management
7206 Hull Street Rd Ste
re: Medical Payment Data
North Chesterfield, VA 23235-0000

Receivables Management System
PO Box 8630
Richmond, VA 23226-0000

Receivables Management Systems
PO box 8630
Richmond, VA 23226-0000

Riverside Emergency Phys
PO Box 1929
Kilmarnock, VA 22482-1929

Riverside Emergency Phys
PO Box 1929
Kilmarnock, VA 22482-0000

Riverside Health System
PO Box 2858
Raleigh, NC 27602-0000

Riverside Med Grp Emer Phys
PO Box 75774
Baltimore, MD 21275-5774

Riverside Medical Group LLC
10645 Cherokee Road
Richmond, VA 23235-0000

Riverside Tappahannock Hospita
618 Hospital Rd
Tappahannock, VA 22560-0000

SME, Inc. USA
PO Box 15209
Wilmington, NC 28408-0000

State of Connecticut
Dept. of Revenue Services
Twenty-Five Sigourney Street
Hartford, CT 06106-0000

Stellar Rec
1845 Us Hwy 93 Sou
Kalispell, MT 59901-0000

Sunrise Credit Service
260 Airport Plaza
re: Cablevision
Farmingdale, NY 11735-0000

Toll Violation Processing Cntr
PO Box 1234
Clifton Forge, VA 24422-0000

United Collect Bur Inc
5620 Southwyck Blvd Ste
Toledo, OH 43614-0000

United Consumers, Inc
PO Box 4466
Woodbridge, VA 22194-0000

Virginia Cardiovascular Specia
5875 Bremo Rd, STE 512
Richmond, VA 23226-0000

West End Orthopaedic Clinic
PO Box 35725
Richmond, VA 23235-0000

Yale New Haven Hospital
20 York St
New Haven, CT 06510-0000

Yale-New Haven Health
PO Box 1403
New Haven, CT 06505-0000

Yankee Gas
107 Selden St.
Berlin, CT 06037-0000

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: Connie and Albert Balderson
Debtor(s)

Case No.: 16-31532-KRH
Chapter 13

MOTION FOR AN EXPEDITED HEARING

NOW COMES the Debtor, Connie and Albert Balderson, by counsel, to submit the following Motion for an Expedited Hearing under 11 U.S.C. §362 to allow the Debtors to Extend Time to File Reaffirmation Agreement pursuant to 11 U.S.C. §362 (c)(3)(B).

The Debtor(s) request that court Extends Time to File Reaffirmation Agreement, and in support of this Motion states the following:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. § 157 and 1334 and 11 U.S.C. § 362, and this matter is a core proceeding under the Bankruptcy Code.
2. On 3/29/2016, the Debtor(s) filed in this Honorable Court a petition for relief under Chapter 13 of the Bankruptcy Code, 11 U.S.C. § 1301 et seq. (the "instant case"). Peter Barrett was appointed to serve as Chapter 13 trustee in this case (the "Trustee").
3. The initial Trustee Meeting was held on 5/2/2016.
4. Time to file Reaffirmation Agreement expired on July 1, 2016.
5. Time is of the essence in this matter because the Creditor, Ford Motor Company, has already repossessed the vehicle. In order to release the vehicle back to the Debtors, the Creditor wants the reaffirmation agreement completed. Debtors require two vehicles to get to work, as they work more than thirty minutes apart.

WHEREFORE, the Plaintiff prays that this Honorable Court allow the Debtor(s) to obtain an extension of the automatic stay pursuant to 11 U.S.C. §362(c)(3)(B) and grant an Expedited Hearing and any such other relief as may be deemed just and proper by this Honorable Court.

RESPECTFULLY SUBMITTED:

Counsel for
Albert and Connie Balderson
By: /s/ Richard J. Oulton
Richard J. Oulton, Esq.
VSB # 29640
8501 Mayland Dr. Ste 106
Henrico, VA 23294
804-308-0051 (ph)
804-308-0053 (fax)

NOTICE IS HEREBY GIVEN PURSUANT TO LOCAL RULE 9013-1 UNLESS A WRITTEN RESPONSE TO THIS MOTION AND SUPPORTING MEMORANDUM ARE FILED WITH THE CLERK OF COURT AND SERVED ON THE MOVING PARTY WITHIN THREE BUSINESS DAYS OF THE SERVICE OF THIS MOTION TO EXPEDITE HEARING, THE COURT MAY DEEM ANY OPPOSITION WAIVED AND CONCEDED AND ISSUE AN ORDER SUSTAINING THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

CERTIFICATE OF SERVICE

I certify that on 7/11/2016, a copy of the above Motion to Expedite Hearing has been mailed via first class mail or via electronic means to Peter Barrett, Trustee, the United States Trustee, counsel listed as follows, and all creditors set forth on the attached mailing matrix.

/s/ Richard J. Oulton
Richard J. Oulton, Esq.

Creditors

American Adjustment Bu
re: NW CT Emergency Med PC
73 Field St
Waterbury, CT 06702-0000

American Adjustment Bu
re: NW CT Emergency Med
73 Field St.
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American Adjustment Bu
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Attn: Bankruptcy Dept
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Valhalla, NY 10595-1340

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Hawthorne, NY 10532-0000

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re: Joseph Quaranta, MD
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Richmond, VA 23235-0000

Yale New Haven Hospital

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New Haven, CT 06510-0000

Yale-New Haven Health

PO Box 1403
New Haven, CT 06505-0000

Yankee Gas

107 Selden St.
Berlin, CT 06037-0000